

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	Case No. 09-10243-MLW
	)	
v.	)	
	)	
RYAN HARRIS,	)	
	)	
Defendant	)	

**STIPULATIONS**

**I. *Factual Stipulations***

The parties agree that the following facts are true:

1. The defendant Ryan Harris also used the internet user name “DerEngel.”
2. Harris was the founder, owner, and president of TCNiSO, Inc.
3. TCNiSO was incorporated in California, with its principal place of business in the San Diego area.

**II. *Evidentiary stipulations***

The parties stipulate that the following exhibits are authentic:

Exhibit No.	Description
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- |    |  |
|----|--|
| 1  | TCNiSO incorporation documents   |
| 2  | TCNiSO website screen shots  |
| 3  | TCNiSO website forum indices   |
| 22 | TCNiSO website forum posts about MAC address / configuration file swapping |
| 23 | TCNiSO website forum posts about ISPs blocking TCNiSO products             |
| 24 | TCNiSO website forum posts about obtaining free service / uncapping        |
| 29 | Washington Mutual Bank TCNiSO account agreement                            |

30      Paypal account summary for Harris/TCNiSO

31      GoDaddy invoice for tcniso.net

III.      **The parties stipulate that the following exhibits are admissible:**

11      Chat

12      Chat

IV.      **Business Records: The parties stipulate that the following exhibits constitute accurate copies of business records under Fed. R. Evid. 803(6):**

1      TCNiSO incorporation documents

29      Washington Mutual Bank TCNiSO account agreement

30      Paypal account summary for Harris/TCNiSO

31      GoDaddy invoice for tcniso.net

Respectfully submitted,

CARMEN M. ORTIZ  
United States Attorney

CHARLES McGINTY  
Counsel for Harris

By:      /s/ Adam Bookbinder  
Adam J. Bookbinder  
Assistant U.S. Attorney  
Mona Sedky  
Department of Justice Trial Attorney

/s/ Charles McGinty  
Office of the Federal Defender

RYAN HARRIS  
  
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CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Adam J. Bookbinder

Dated: February 23, 2012